



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

September 27, 2011

Thomas Keeney  
Ecologist/Biological Sciences Manager  
U.S. Army Corps of Engineers  
915 Wilshire Boulevard, 14th Floor  
Los Angeles, California 90017

Subject: Final Environmental Impact Statement for San Clemente Shoreline Protection Project, Orange County California. (CEQ# 20110285)

Dear Mr. Keeney:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for San Clemente Shoreline Protection Project, Orange County California. Our review is provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act. Our comments were also prepared in accordance with the provisions of the Federal Guidelines promulgated at 40 CFR 230 under Section 404(b)(1) of the Clean Water Act (CWA).

EPA reviewed the Draft Environmental Impact Statement (DEIS) for San Clemente Shoreline Protection Project (Project) and provided comments to the U.S. Army Corps of Engineers, (Corps), on September 20, 2010. We rated the document EC-2, Environmental Concerns – Insufficient Information based on potential impacts to waters of the United States (WUS), quality of beach nourishment materials, biological resources, climate change and air quality. Based on our review of the FEIS, some of our concerns regarding the significant environmental impacts identified in our comments on the DEIS remain unresolved.

EPA continues to have concerns regarding the use of sediment analysis results for the proposed Oceanside borrow pit that are 5-6 years old. We continue to recommend additional confirmatory testing data no more than 3 years old to ensure accurate sediment characterization is performed before the signing of the ROD. Results of the sediment testing should include a description of how many cores and if the core sampling reached the anticipated dredging depth. Should the testing determine that contaminants exceed acceptable levels; the Corps should consider other sources of beach nourishment materials.

The FEIS indicates that the shoreline is "essentially in balance between erosion and accretion" [p. 4-35]. Furthermore, the document acknowledges that the shoreline will likely change as a result of projected sea level rise, ("present best estimates regarding sea level rise within southern

California vary between 0.1 and 0.2 ft (0.03 to 0.06 m) in a time span of 25 years"[p.4-27]). Given projected sea level rise, the shoreline should be monitored for any changes that may occur. Based on the combined impacts of the sediment placement and projected sea level rise, we recommend the Corps consider a shorter time period e.g. 25 years for the project. Due to the potential adverse impacts to biological resources resulting from the placement of the large volumes of sediment, we also recommend monitoring and assessment of impacts to species of concern and their habitat in the project area. We encourage the Corps to include in the ROD the results of a current comprehensive biological survey of the San Clemente shoreline. Without such baseline data, it would be difficult, if not impossible, to accurately evaluate or mitigate the environmental impacts of the proposed action.

It is unclear whether the off-shore emissions associated with the proposed action have been included in the general conformity applicability analysis for this project. The ROD should ensure that the direct and indirect emissions from both the construction and the operational phases of the project, including the off-shore emissions within three miles of the coast, conform to the approved State Implementation Plan and do not cause or contribute to violations of the NAAQS.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or [munson.james@epa.gov](mailto:munson.james@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', written over a horizontal line.

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Cc:

Bryant Chesney, NOAA

David Zoutendyk, USFWS

Loni Adams, CDFG

U.S. Army Corps of Engineers, Headquarters.